

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

Mondaire Jones, et al.,
*individually, and on behalf of all others similarly
situated,*

Plaintiffs,

v.

United States Postal Service, et al.,
Defendants.

Docket No. 20-cv-6516-VM

**DECLARATION OF
J. REMY GREEN**

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

I, J. Remy Green, being duly sworn, depose and say:

1. I am counsel for Plaintiffs and the putative class, and I make this declaration to place certain documents and information in the record.

2. Attached as Exhibit 1 is a true copy of a presentation that was shown in the Headquarters teleconference discussed during the hearing and in the Court's Decision. *See, e.g.*, ECF No. 49 at 13 (discussing "statements made regarding late and extra trips at [a] July 10, 2020 meeting"). *See* Jacob Bogage, Internal USPS documents link changes behind mail slowdowns to top executives, WASH. POST (Sept. 24, 2020) (breaking a story regarding this presentation, given by David E. Williams, USPS's chief of logistics and processing operations).¹

3. Attached as Exhibit 2 is a true copy of a letter regarding overtime standards from Melinda K. Holmes, the General Counsel to the American Postal Workers Union, AFL-CIO, regarding the September 21 and September 25 memoranda drafted by Defendants, prepared for the Court as a letter (given the short turn around) at my request.

¹ Available at <https://www.washingtonpost.com/business/2020/09/24/usps-delays-dejoy-documents/>.

4. During our negotiations with Defendants to settle the Order, as directed by the Court, Defendants proposed this language:

“Overtime is authorized and instructed to be used as necessary to facilitate the timely delivery of Election Mail, as described in the September 21 USPS Instructions and in forthcoming further guidance on the use of additional resources in aid of the November 2020 Election.”

As permitted in 28 U.S.C § 1746, I, J. Remy Green, declare, under penalty of perjury, that the foregoing is true and correct.

Executed On: September 27, 2020

J. Remy Green